

IRS News Release

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IRS Chief Counsel Appoints Zelnik as Senior Counsel, Position Focuses on Abusive Transactions

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WASHINGTON — The Internal Revenue Service Office of Chief Counsel today announced the selection of Jonathan Zelnik as acting Senior Counsel to the Chief Counsel. In this role, Zelnik will be the primary advisor on abusive tax transactions to the Chief Counsel.

"Halting the promotion and use of abusive tax schemes is one of my top priorities," IRS Chief Counsel Donald Korb said. "We have many talented and dedicated attorneys in Counsel working on shelters, and the Senior Counsel will play a key role as my principal advisor in achieving this goal. Jonathan's background analyzing complex tax shelters and experience in the Office of Chief Counsel make him a solid choice for this important position."

As Senior Counsel, Zelnik works with the IRS and Treasury's Office of Tax Policy to identify, analyze and issue timely administrative guidance to address abusive transactions. The Senior Counsel's role is to improve how the Office of Chief Counsel addresses abusive shelters, from improving communication and coordination within Counsel to helping the IRS identify and stop the marketing of abusive shelters in a timely manner.

To date the IRS and Treasury have identified thirty-one listed tax transactions—potentially abusive schemes that must be disclosed to the IRS. Recently listed transactions address complex, questionable situations involving partnerships, S corporations, foreign tax credit intermediary transactions, Roth IRA transactions, employee stock ownership plans, and offsetting foreign currency option contracts.

Zelnik has worked for Chief Counsel since October 1994. A 1994 graduate of Loyola Law School in Los Angeles, he started in the Office of the Assistant Chief Counsel, Financial Institutions and Products. Later he became the Senior Legal Counsel, Corporate Tax Shelters, in the Office of the Division Counsel for Large and Mid-Size Business and most recently was Special Counsel to the Senior Counsel.

Zelnik's appointment, which was effective July 27, is subject to certification by the Office of Personnel Management.

More information on abusive tax shelters and transactions is available on IRS.gov.